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Attorney for Plaintiff JACQUELYNN NICKLER

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

JACQUELYNN NICKLER,	)	Case No. 2:14-cv-01907-JCM-DJA
	)	
Plaintiff,	)	<b>STIPULATION AND ORDER TO</b>
	)	<b>EXTEND TIME FOR PLAINTIFF</b>
vs.	)	<b>TO REPLY TO DEFENDANTS'</b>
	)	<b>OPPOSITIONS TO MOTION</b>
COUNTY OF CLARK, organized and of the	)	<b>FOR LEAVE TO FILE</b>
existing under the laws of State of Nevada;	)	<b>AMENDED COMPLAINT</b>
STEVEN D. GRIERSON, court administrator,	)	<b>(FIRST REQUEST)</b>
individually; KATHLEEN LAMBERMONT,	)	
administrator of the Clark County District	)	
Attorney's office, individually; and, DOE 1	)	
through 10, inclusive;	)	
	)	
Defendants.	)	

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The parties, by and through their respective counsel, hereby stipulate to extend the time for Plaintiff to reply to the Defendants' oppositions (ECF Nos. 108 and 109) to Plaintiff's motion seeking leave to file a First Amended Complaint. (ECF No. 103) Also Defendants Clark County and Lambermont filed a separate Joinder to Defendant Grierson's Opposition (ECF No. 112). The proposed extension is from the current due date of Thursday, November 14, 2019 through and including Thursday, November 21, 2019.

This is the first request for an extension of this deadline. The parties provide the

1 following information to the Court regarding the proposed extension of time:

- 2 1. Plaintiff's counsel has informed Defense counsel that an extension to file  
3 the reply is needed because due to the Veterans Day holiday weekend, with  
4 a number of longstanding family plans and responsibilities there has been  
5 insufficient time for Plaintiff's counsel to respond to the 19 page and 12  
6 page Oppositions and the five page Joinder;
- 7 2. Plaintiff's counsel has family in from Florida and Washington for a long  
8 planned family get together surrounding Plaintiff's son playing in his Las  
9 Vegas Academy band concert at the Smith Center on Wednesday night,  
10 November 13, 2019. These family members arrived on Saturday and  
11 Tuesday respectively and the last of them do not leave until this coming  
12 Saturday.
- 13 3. Additionally, Plaintiff's counsel has had a very heavy workload in this  
14 period. On November 12 he had a morning hearing in state court and an  
15 afternoon deposition in another cases against Clark County at the office of  
16 Mr. Freeman (opposing counsel in this matter for Clark County and  
17 Lambermont). Then on Wednesday, November 13 Plaintiff's counsel had  
18 a lengthy settlement conference with Magistrate Judge Albregts followed  
19 by an administrative Workers' Compensation appeal hearing and then  
20 several client meetings. Thursday, November 14 must be devoted to  
21 opposing a Summary Judgment Motion, the opposition being due on  
22 Monday, November 18, 2019.

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This stipulation to extend the deadline is made in good faith and not for purposes of delay.

Dated: November 14, 2019


Dated: November 14, 2019

/s/ James P. Kemp  
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Attorney for Steven D. Grierson

IT IS SO ORDERED:

  
\_\_\_\_\_  
MAGISTRATE JUDGE

Dated: November 18, 2019